

November 2, 2007

Gary Fields, Treasurer American Bankers Association PAC (BankPac) 1120 Connecticut Avenue NW Washington, DC 20036

Response Due Date: December 4, 2007

Identification Number: C00004275

Reference:

August Monthly Report (7/1/07-7/31/07)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. Failure to adequately respond by the response date noted above could result in an audit or enforcement action. Additional information is needed for the following 2 items:

Schedule B of your report (see attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) prohibits a multicandidate committee and its apparent affiliates from making a contribution to a candidate for federal office in excess of \$5,000 per election.

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If any contribution you made exceeds the limits, you must request a refund of the excessive amount or provide a written authorization for a redesignation of the contribution pursuant to 11 CFR §110.2(b) within 60 days of the treasurer's receipt.

If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund of the excessive amount.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund or redesignation request sent

to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. 11 CFR §110.1(b)

Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

2. Schedule B of your report (see attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) prohibits a committee and its apparent affiliates from making contributions to another political committee in excess of \$5,000 per calendar year.

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If you have made an excessive contribution, you must notify the recipient and request a refund of the amount in excess of \$5,000. The refund of the excessive amount must be made within sixty (60) days of receipt of the contribution.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received.

Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund will be taken into consideration.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. Requests for extensions of time in which to respond will not be considered.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1148.

Sincerely,

Quy Vuong

Campaign Finance Analyst Reports Analysis Division

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Excessive Contribution(s) to Candidate(s) with an Affiliated Committee(s)

Recipient Name	Date	Amount	Election	Report	
Recipient Ivanic	Date	Amount	Election	Report	Contributing Affiliate
Barney Frank for	2/27/2007	\$250	P-2008	2007 Mid-	Massachusetts
Congress Committee				Year	Bankers PAC-
					Federal Fund
Barney Frank for	3/26/2007	\$2,500	P-2008	2007 April	American
Congress Committee				Monthly	Bankers
	ĺ				Association
					PAC
					(BankPac)
Barney Frank for	3/26/2007	\$1,000	P-2008	2007 April	America's
Congress Committee				Monthly	Community
	[				Bankers
					Community
					Campaign
					Committee
Barney Frank for	6/6/2007	\$1,500	P-2008	2007 July	American
Congress Committee				Monthly	Bankers
					Association
	i				PAC
	. <u></u>				(BankPac)
Barney Frank for	7/20/2007	\$1,000	P-2008	2007	American
Congress Committee				August	Bankers
				Monthly	Association
					PAC
					(BankPac)
Baker for Congress	3/26/2007	\$1,000	P-2008	2007 April	America's
Committee	1			Monthly	Community
					Bankers
·	ļ			•	Community
					Campaign
					Committee
Baker for Congress	5/10/2007	\$1,000	P-2008	2007 June	American
Committee				Monthly	Bankers
			İ		Association
					PAC
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Recipient Name	Date	Amount	Election	Report	Contributing Affiliate
Baker for Congress	6/26/2007	\$1,000	P-2008	2007 July	America's
Committee				Monthly	Community
				-	Bankers
					Community
					Campaign
					Committee
Baker for Congress	7/19/2007	\$4,000	P-2008	2007	American
Committee				August	Bankers
				Monthly	Association
					PAC
					(BankPac)
Castle Campaign	3/21/2007	\$1,000	P-2008	2007 April	American
Fund				Monthly	Bankers
					Association
					PAC
					(BankPac)
Castle Campaign	4/25/2007	\$1,000	P-2008	2007 May	America's
Fund				Monthly	Community
					Bankers
					Community
					Campaign
			:		Committee
Castle Campaign	7/10/2007	\$4,000	P-2008	2007	American
Fund				August	Bankers
				Monthly	Association
					PAC
					(BankPac)
Friends of Jeb	3/19/2007	\$1,000	P-2008	2007 April	American
Hensarling				Monthly	Bankers
					Association
		1			PAC
					(BankPac)
Friends of Jeb	4/25/2007	\$2,000	P-2008	2007 May	America's
Hensarling		!		Monthly	Community
				-	Bankers
					Community
		•			Campaign
		. <u>-</u>			Committee

Recipient Name	Date	Amount	Election	Report	Contributing Affiliate
Friends of Jeb	5/16/2007	\$2,000	P-2008	2007 June	American
Hensarling				Monthly	Bankers
				_	Association
					PAC
					(BankPac)
Friends of Jeb	5/24/2007	\$1,000	P-2008	2007 June	America's
Hensarling		-		Monthly	Community
		1		_ ]	Bankers
	•				Community
					Campaign
					Committee
Friends of Jeb	7/19/2007	\$2,000	P-2008	2007	American
Hensarling				August	Bankers
_	<u> </u>			Monthly	Association
				-	PAC
					(BankPac)
Brad Miller for	1/30/2007	\$1,000	P-2008	2007	America's
United States	<u> </u>			February	Community
Congress			:	Monthly	Bankers
				_	Community
					Campaign
					Committee
Brad Miller for	3/2/2007	\$1,000	P-2008	2007 April	American
United States			:	Monthly	Bankers
Congress					Association
					PAC
<u> </u>					(BankPac)
Brad Miller for	3/6/2007	\$2,500	P-2008	2007 April	American
United States				Monthly	Bankers
Congress					Association
	]				· PAC
	<u> </u>				(BankPac)
Brad Miller for	7/31/2007	\$1,500	P-2008	2007	American
United States				August	Bankers
Congress				Monthly	Association
				_	PAC
ļ <u> </u>	<u> </u>				(BankPac)

Excessive Contribution to a Committee with an Affiliate Committee

Recipient Name	Date	Amount	Report	Contributing Affiliate
Glacier PAC	6/26/2007	\$2,000	2007 July	America's Community
	1		Monthly	Bankers Community
		i		Campaign Committee
Glacier PAC	7/20/2007	\$5,000	2007	American Bankers
		i	August	Association PAC
	•		Monthly	(BankPac)